

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Stephanie Garabedian, Esq.
5 Nevada Bar No. 9612
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 sgarabedian@wrightlegal.net
11 *Attorneys for Defendant, Freakling Bros., Inc.*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 COVINGTON SPECIALTY INSURANCE
11 COMPANY, a New Hampshire Corporation,

12 Plaintiff,

13 vs.

14 FREAKLING BROS. INC., a Nevada
15 Corporation; GRAND FLAMINGO
16 CAPITAL MANAGEMENT, LLC., a Nevada
17 Limited Liability Company; JA KENNEDY
18 REAL ESTATE COMPANY, a Nevada
19 Corporation,

Defendants.

Case No.: 2:23-cv-00968-APG-VCF

**STIPULATION FOR EXTENSION OF
TIME TO FILE OPPOSITION TO
COVINGTON SPECIALTY
INSURANCE COMPANY'S MOTION
FOR SUMMARY JUDGMENT [ECF 37]**

(Second Request)

20 Defendants, Freakling Bros., Inc. ("Freakling Bros.") and JA Kennedy Real Estate
21 Company ("JA Kennedy," and with Freakling Bros., "Defendants"), and Plaintiff, Covington
22 Specialty Insurance Company ("Covington" and with Defendants, the "Parties"), by and through
23 their counsel of record, hereby stipulate and agree as follows:

- 24 1. On December 7, 2023, Covington filed its Memorandum of Points and Authorities in
25 Support of its Motion for Summary Judgment [ECF No. 37] (the "Motion");
26 2. On December 22, 2023, the Parties stipulated to extend Defendants' deadline to
27 respond to the Motion from December 28, 2023, to January 5, 2024 [ECF No. 40];
28

- 1 3. Defendants have requested an additional three business days to January 10, 2024 to
2 file their Oppositions to the Motion;
3 4. Under LR 7-2(b), Covington's reply will be due 14 days later on January 24, 2024;
4 5. Counsel for Covington does not oppose the requested extension; and
5 6. This is the second request for an extension which is made in good faith and not for
6 purposes of delay.

7 **IT IS SO STIPULATED.**

8 DATED this 5th day of January, 2024.

9 WRIGHT, FINLAY & ZAK, LLP

MUSICK, PEELER & GARRETT LLP

10 /s/ Darren T. Brenner

/s/ Nancy J.W. Brown

11 Darren T. Brenner, Esq.
12 Nevada Bar No. 8386
13 Stephanie Garabedian, Esq.
14 Nevada Bar No. 9612
15 7785 W. Sahara Ave., Suite 200
16 Las Vegas, NV 89117
17 *Attorneys for Defendant, Freakling Bros.,
18 Inc.*

Nancy J.W. Brown, Esq.
Nevada Bar No. 4484
333 S. Hope Street, Suite 2900
Los Angeles, CA 90071

CHRISTIAN, KRAVITZ, DICHTER,
JOHNSON & SLUGA, LLC

17 GARMAN | TURNER | GORDON

Tyler J. Watson, Esq.
Nevada Bar No. 11735
8985 Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

18 /s/ Eric R. Olsen

19 Eric R. Olsen, Esq.
20 Nevada Bar No. No. 3127
21 7251 Amigo Street, Suite 210
22 Las Vegas, NV 89119
23 *Attorneys for Defendant, JA Kennedy Real
24 Estate Inc.*

*Attorneys for Plaintiff, Covington Specialty
Insurance Company*

24 **IT IS SO ORDERED:**

25 
26 UNITED STATES DISTRICT JUDGE

27 DATED: January 8, 2024
28